

1 THE HONORABLE THOMAS S. ZILLY  
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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 TODD RAY JONES, Plaintiff,  
10 v.

11 KING COUNTY, a political subdivision;  
12 The KING COUNTY DEPARTMENT OF  
13 ADULT AND JUVENILE DETENTION, a  
14 department of KING COUNTY; KING  
15 COUNTY CORRECTIONAL FACILITY –  
16 SEATTLE, a department of the KING  
17 COUNTY DEPARTMENT OF ADULT  
18 AND JUVENILE DETENTION and KING  
19 COUNTY; King County Corrections Officer  
20 KENNETH GRANT, in his individual and  
21 official capacity, and KENNETH and JANE  
22 DOE GRANT, husband and wife and the  
23 marital community comprised thereof; King  
County Corrections Officer TROY  
ELERICK, in his individual and official  
capacity, and TROY and JANE DOE  
ELERICK, husband and wife and the  
marital community comprised thereof; King  
County Corrections Officer KEVIN  
OLSON, in his individual and official  
capacity, and KEVIN and JANE DOE  
OLSON, husband and wife and the marital  
community comprised thereof; King County  
Corrections Sergeant GRADY CONNER, in  
his individual and official capacity, and  
GRADY and JANE DOE CONNER,

NO. 2:22-cv-00572-TSZ

**MOTION AND ORDER FOR  
SUBSTITUTION**

MOTION AND ORDER FOR SUBSTITUTION - 1

**TOMLINSON  
BOMSZTYK  
RUSS**

1000 Second Avenue, Suite 3660,  
Seattle, Washington 98104-1046  
P/ 206.621.1871 F/ 206.621.9907

1 husband and wife and the marital  
2 community comprised thereof; King County  
3 Corrections Major TODD CLARK, in his  
4 individual and official capacity, and TODD  
5 and JANE DOE CLARK, husband and wife  
6 and the marital community comprised  
thereof; and King County Corrections  
Captain BARCLAY PIERSON, in his  
individual and official capacity, and  
BARCLAY and JANE DOE PIERSON,  
husband and wife and the marital  
community comprised thereof,

7 Defendants.

8 **I. MOTION**

9 COMES NOW, Plaintiff Todd Ray Jones, by and through his undersigned counsel, to  
10 respectfully move this Court for an order substituting “Darla Jean Stallings as Administrator  
11 of The Estate of Todd Ray Jones” for Plaintiff in this matter, Todd Ray Jones, who is now  
12 deceased.

13 Ms. Darla Jean Stallings (“Ms. Stallings”), Administrator of the Estate of Todd Ray  
14 Jones, shows to the Court that:

15 1. Todd Ray Jones, the Plaintiff in this action, died intestate on September 16,  
2022.

16 2. Letters of Administration were issued to Ms. Stallings, as Administrator of the  
Estate of Todd Ray Jones, by Superior Court of the State of Washington, in and  
for the County of King, Cause No. 22-4-08284-1 SEA, on December 14, 2022.

17 3. Darla Jean Stallings is duly qualified and is now acting as Administrator of the  
Estate of Todd Ray Jones and is now the representative of Todd Ray Jones, the  
now-deceased Plaintiff.

18 4. This action is not extinguished by the death of Todd Ray Jones, Plaintiff; and

19 5. No party herein filed and/or served a suggestion of death. *See Fed. R. Civ. P.*  
Rule 25.

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21 MOTION AND ORDER FOR SUBSTITUTION - 2

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DATED this 18<sup>th</sup> day of January 2023.

## TOMLINSON BOMSZTYK RUSS

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## II. ORDER

Consistent with the motion set forth above, and pursuant to Fed. R. Civ. P. 25, it is ordered that Darla Jean Stallings, as Administrator of The Estate of Todd Ray Jones, be and is substituted as a party-plaintiff in the place and stead of Plaintiff, Todd Ray Jones, deceased.

Based on the foregoing, IT IS SO ORDERED.

Dated this 6th day of February, 2023.

Thomas S. Balle

Thomas S. Zilly  
United States District Judge

*Presented by:*

## TOMLINSON BOMSZTYK RUSS

By:

By: \_\_\_\_\_  
Blair M. Russ, WSBA #40374  
Anthony S. Marinella, WSBA #55611  
Attorneys for Plaintiff

MOTION AND ORDER FOR SUBSTITUTION - 3

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